

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
v.) Criminal No. 18-10428-ADB
)
FRANKLIN FREDDY MEAVE VAZQUEZ,)
)
 Defendant.)

JOINT MEMORANDUM PURSUANT TO LOCAL RULE 116.5(a)

The United States and counsel for the Defendant file this joint memorandum pursuant to Local Rule 116.5(a), stating the following:

1. The government has provided automatic discovery. There are no pending discovery requests.
2. Defendant has completed review of approximately 80 % of the discovery provided by the government. The defendant intends to file discovery requests and hopes to do so by April 8, 2019. In addition, defense counsel intends to file a sealed motion relating to discovery. Counsel will expand on this motion and request a briefing schedule at the status conference scheduled for April 8, 2019.
3. It does not appear at this time that there is a need for a protective order regarding the dissemination of sensitive information.
4. Defendant does not yet know whether he will file any pretrial motions under Rule 12(b).
5. The Court has previously excluded the period from January 7, 2019 (the date of the initial status conference) through April 8, 2019, the date of the interim status conference, for

the purposes of the Speedy Trial Act. The parties have not yet had an opportunity to discuss a possible plea. They estimate that a trial will take approximately two weeks.

6. The parties request that a date for a further status conference and hearing on defendant's anticipated motion be discussed at the scheduled April 8, 2019 status conference.

Respectfully submitted,

FRANKLIN FREDDY MEAVE VASQUEZ
By his attorney,

/s/ Stylianus Sinnis
STYLIANUS SINNIS
Assistant Federal Public Defender

ANDREW E. LELLING
United States Attorney

By: */s/ Laura J. Kaplan*
LAURA J. KAPLAN
CHRISTINE J. WICHERS
Assistant U.S. Attorneys

Certificate of Service

I certify that, on April 3, 2019, this document filed through the ECF system was sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Stylianus Sinnis
Stylianus Sinnis